

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE

|                          |   |                        |
|--------------------------|---|------------------------|
| AMPEX CORPORATION,       | ) |                        |
|                          | ) |                        |
| Plaintiff,               | ) | C.A. No. 04-1373 (KAJ) |
|                          | ) |                        |
| v.                       | ) |                        |
|                          | ) |                        |
| EASTMAN KODAK COMPANY,   | ) |                        |
| ALTEK CORPORATION and    | ) |                        |
| CHINON INDUSTRIES, INC., | ) |                        |
|                          | ) |                        |
| Defendants.              | ) |                        |

**ANNEX B**

**LIST OF DOCUMENTS  
TO BE PROVIDED**

**Requests**

1. Memoranda or reports produced in:

- 1.1 April 1983;
- 1.2 May 1983;
- 1.3 June 1983;
- 1.4 July 1983;
- 1.5 August 1983;
- 1.6 September 1983;
- 1.7 October 1983;
- 1.8 November 1983;
- 1.9 December 1983.

by or for the following Quantel employees:

- (a) Richard Taylor;
- (b) Paul Kellar;
- (c) Michael J. Maidens;
- (d) Nigel Watson;
- (e) Robert A. Pank ; and/or
- (f) Hugh Boyd

relating to observations of the ESS-3 System made by (A) one or more of the persons named at (a) to (e) or (B) by other Quantel employees at the 1983 National Association of Broadcaster convention.

2. Memoranda or reports produced in:

- 2.1 May 1983;
- 2.2 June 1983;
- 2.3 July 1983;
- 2.4 August 1983;
- 2.5 September 1983;
- 2.6 October 1983;
- 2.7 November 1983;
- 2.8 December 1983.

by or for the following Quantel employees:

- (a) Richard Taylor;
- (b) Paul Kellar;
- (c) Michael J. Maidens;

- (d) Nigel Watson;
- (e) Robert A. Pank; and/or
- (f) Hugh Boyd

relating to observations of the ESS-3 System made by (A) one or more of them or (B) by other Quantel employees at the International Television Symposium in Montreux, Switzerland, which took place between 28 May 1983 and 2 June 1983 (inclusive).

- 3. Notes of meetings attended by any or all of Messrs Taylor, Maidens, Watson, Pank and Boyd at which such memoranda or reports, referred to in the above requests, were tabled and/or discussed in:

- 3.1 April 1983
- 3.2 May 1983;
- 3.3 June 1983;
- 3.4 July 1983;
- 3.5 August 1983;
- 3.6 September 1983;
- 3.7 October 1983;
- 3.8 November 1983;
- 3.9 December 1983.

- 4. The earliest full version of a user's guide provided to customers describing or disclosing the operation of the Quantel Picturebox Digital Library System Still Store, which was launched in March/April 1990.
- 5. The earliest full version of an instruction manual provided to customers describing or disclosing the circuitry or operation of the Quantel

Picturebox Digital Library System Still Store, which was launched in March/April 1990.

6. The earliest full version of an operator's manual instruction provided to customers describing or disclosing the circuitry or operation of the Quantel Picturebox Digital Library System Still Store, which was launched in March/April 1990.
7. The earliest full version of an operating instructions manual provided to customers describing or disclosing the circuitry or operation of the Quantel Picturebox Digital Library System Still Store, which was launched in March/April 1990.
8. The earliest full version of an operating manual provided to customers describing or disclosing the circuitry or operation of the Quantel Picturebox Digital Library System Still Store, which was launched in March/April 1990.
9. The earliest full version of a service manual provided to customers describing or disclosing the circuitry or operation of the Quantel Picturebox Digital Library System Still Store, which was launched in March/April 1990.
10. The earliest full version of an operating and service manual provided to customers describing or disclosing the circuitry or operation of the Quantel Picturebox Digital Library System Still Store, which was launched in March/April 1990.

11. The earliest full version of a maintenance manual provided to customers describing or disclosing the circuitry or operation of the Quantel Picturebox Digital Library System Still Store, which was launched in March/April 1990.

The earliest full version of a product guide provided to customers describing or disclosing the circuitry or operation of the Quantel Picturebox Digital Library System Still Store, which was launched in March/April 1990.

MORRIS, NICHOLS, ARSHT & TUNNELL

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